

**From:** [Carlos Lamoutte](#)  
**To:** [Carla García-Benítez](#); [monsita.lecaroz@usdoj.gov](#)  
**Cc:** [Hermann Bauer](#); [Rosa M. Lázaro](#); [Bienenstock, Martin J.](#); [Paul V. Possinger](#) ([ppossinger@proskauer.com](#)); [Ehud Barak](#) ([ebarak@proskauer.com](#)); [Jrapisardi@omm.com](#); [dperez@omm.com](#); [Luis C. Marini](#) ([lmarini@mpmlawpr.com](#)); [Carolina Velaz Rivero](#) ([cvelaz@mpmlawpr.com](#)); [lucdespins@paulhastings.com](#); [Juan J. Casillas-Ayala](#) ([jcasillas@cstlawpr.com](#)); [rgordon@jenner.com](#); [rlevin@jenner.com](#); [csteedge@jenner.com](#); [A J BENNAZAR](#) ([ajb@bennazar.org](#)); [Reylam Guerra](#) ([hacienda.pr.gov](#)); [Rodríguez Omar](#) ([hacienda.pr.gov](#)); [angel.pantoja@hacienda.pr.gov](#); [francisco.pares@hacienda.pr.gov](#); [Francisco.Pena@hacienda.pr.gov](#); [elugo@edgelegalpr.com](#); [Stadler, Katherine](#); [Guy Brenner](#) ([gbrenner@proskauer.com](#))  
**Subject:** RE: 2022 05 18 Letter to US Trustee re Lamoutte unfounded claim  
**Date:** Wednesday, May 18, 2022 10:08:39 PM  
**Attachments:** [image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[Motion to Disqualify O'Neill & Borges LLC \(18-MAY-2022\)-FILED.pdf](#)

Dear Ms. García:

We understand your interpretation of the matter to be incorrect. Your recent letter simply intends to sidestep your firm's compliance with PROMESA, PRRADA and bankruptcy case standards, and to advance the interests of private clients.

Please refer to the attached Motion to Disqualify filed earlier today at the U.S. District Court for the District of Puerto Rico, which is self-explanatory and properly substantiated.

Thanks,

CL



Carlos Lamoutte, Esq.

☎ 787.688.6036 ✉ [cl@carloslamoutte.com](mailto:cl@carloslamoutte.com)

📍 P.O. Box 9022185, San Juan, Puerto Rico 00902

🌐 [www.carloslamoutte.com](http://www.carloslamoutte.com)

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**From:** Carla García-Benítez <[Carla.Garcia@oneillborges.com](mailto:Carla.Garcia@oneillborges.com)>

**Sent:** Wednesday, May 18, 2022 8:51 PM

**To:** [monsita.lecaroz@usdoj.gov](#)

**Cc:** [Hermann Bauer](#) <[Hermann.Bauer@oneillborges.com](mailto:Hermann.Bauer@oneillborges.com)>; [Rosa M. Lázaro](#) <[rosa.lazaro@oneillborges.com](mailto:rosa.lazaro@oneillborges.com)>; [Bienenstock, Martin J.](#) <[mbienenstock@proskauer.com](mailto:mbienenstock@proskauer.com)>; [Paul V. Possinger](#) ([ppossinger@proskauer.com](mailto:ppossinger@proskauer.com)) <[ppossinger@proskauer.com](mailto:ppossinger@proskauer.com)>; [Ehud Barak](#) ([ebarak@proskauer.com](mailto:ebarak@proskauer.com)) <[ebarak@proskauer.com](mailto:ebarak@proskauer.com)>; [Jrapisardi@omm.com](#); [dperez@omm.com](#); [Luis C. Marini](#) ([lmarini@mpmlawpr.com](mailto:lmarini@mpmlawpr.com)) <[lmarini@mpmlawpr.com](mailto:lmarini@mpmlawpr.com)>; [Carolina Velaz Rivero](#) ([cvelaz@mpmlawpr.com](mailto:cvelaz@mpmlawpr.com)) <[cvelaz@mpmlawpr.com](mailto:cvelaz@mpmlawpr.com)>; [lucdespins@paulhastings.com](#); [Juan J. Casillas-Ayala](#) ([jcasillas@cstlawpr.com](mailto:jcasillas@cstlawpr.com)) <[jcasillas@cstlawpr.com](mailto:jcasillas@cstlawpr.com)>; [rgordon@jenner.com](#); [rlevin@jenner.com](#); [csteedge@jenner.com](#); [A J BENNAZAR ZEQUEIRA](#) ([ajb@bennazar.org](mailto:ajb@bennazar.org)) <[ajb@bennazar.org](mailto:ajb@bennazar.org)>; [Reylam Guerra](#) ([hacienda.pr.gov](mailto:hacienda.pr.gov)); [Rodríguez Omar](#) ([hacienda.pr.gov](mailto:hacienda.pr.gov)); [angel.pantoja@hacienda.pr.gov](#); [francisco.pares@hacienda.pr.gov](#); [Francisco.Pena@hacienda.pr.gov](#); [elugo@edgelegalpr.com](#); [Stadler, Katherine](#) <[KStadler@gklaw.com](mailto:KStadler@gklaw.com)>; [Carlos Lamoutte](#) <[cl@carloslamoutte.com](mailto:cl@carloslamoutte.com)>; [Guy Brenner](#) ([gbrenner@proskauer.com](mailto:gbrenner@proskauer.com)) <[gbrenner@proskauer.com](mailto:gbrenner@proskauer.com)>

**Subject:** 2022 05 18 Letter to US Trustee re Lamoutte unfounded claim

Dear Ms. Lecaroz:

Please see attached letter, which is self explanatory.

Respectfully,

CARLA GARCÍA-BENÍTEZ

O'NEILL & BORGES LLC, 250 AVE. MUÑOZ RIVERA, STE. 800 SAN JUAN, P.R. 00918-1813  
D. 787-282-5737 | T. 787-764-8181 | F. 787-753-8944 |

[WWW.ONEILLBORGES.COM](http://WWW.ONEILLBORGES.COM)

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**From:** Carla García-Benítez

**Sent:** Tuesday, April 26, 2022 5:37 PM

**To:** [monsita.lecaroz@usdoj.gov](mailto:monsita.lecaroz@usdoj.gov)

**Cc:** Hermann Bauer <[Hermann.Bauer@oneillborges.com](mailto:Hermann.Bauer@oneillborges.com)>; Rosa M. Lázaro <[rosa.lazaro@oneillborges.com](mailto:rosa.lazaro@oneillborges.com)>; Bienenstock, Martin J. <[mbienenstock@proskauer.com](mailto:mbienenstock@proskauer.com)>; Paul V. Possinger ([ppossinger@proskauer.com](mailto:ppossinger@proskauer.com)) <[ppossinger@proskauer.com](mailto:ppossinger@proskauer.com)>; Ehud Barak ([ebarak@proskauer.com](mailto:ebarak@proskauer.com)) <[ebarak@proskauer.com](mailto:ebarak@proskauer.com)>; [jrapisardi@omm.com](mailto:jrapisardi@omm.com); [dperez@omm.com](mailto:dperez@omm.com); Luis C. Marini ([lmagini@mpmlawpr.com](mailto:lmagini@mpmlawpr.com)) <[lmagini@mpmlawpr.com](mailto:lmagini@mpmlawpr.com)>; Carolina Velaz Rivero ([cvelaz@mpmlawpr.com](mailto:cvelaz@mpmlawpr.com)) <[cvelaz@mpmlawpr.com](mailto:cvelaz@mpmlawpr.com)>; [lucdespins@paulhastings.com](mailto:lucdespins@paulhastings.com); Juan J. Casillas-Ayala ([jcasillas@cstlawpr.com](mailto:jcasillas@cstlawpr.com)) <[jcasillas@cstlawpr.com](mailto:jcasillas@cstlawpr.com)>; 'aaneses@cstlawpr.com' <[aaneses@cstlawpr.com](mailto:aaneses@cstlawpr.com)>; [rgordon@jenner.com](mailto:rgordon@jenner.com); [rlevin@jenner.com](mailto:rlevin@jenner.com); [csteeg@jenner.com](mailto:csteeg@jenner.com); A J BENNAZAR ZEQUEIRA ([ajb@bennazar.org](mailto:ajb@bennazar.org)) <[ajb@bennazar.org](mailto:ajb@bennazar.org)>; [Reylam.Guerra@hacienda.pr.gov](mailto:Reylam.Guerra@hacienda.pr.gov); [Rodriguez.Omar@hacienda.pr.gov](mailto:Rodriguez.Omar@hacienda.pr.gov); [angel.pantoja@hacienda.pr.gov](mailto:angel.pantoja@hacienda.pr.gov); [francisco.pares@hacienda.pr.gov](mailto:francisco.pares@hacienda.pr.gov); [Francisco.Pena@hacienda.pr.gov](mailto:Francisco.Pena@hacienda.pr.gov); [elugo@edgelegalpr.com](mailto:elugo@edgelegalpr.com); Stadler, Katherine <[KStadler@gklaw.com](mailto:KStadler@gklaw.com)>; [cl@carloslamoutte.com](mailto:cl@carloslamoutte.com)

**Subject:** 2022 04 26- Letter to US Trustee re Lamoutte unfounded claim

Please see attached letter, which is self explanatory.  
Cordially,

CARLA GARCÍA-BENÍTEZ

O'NEILL & BORGES LLC, 250 AVE. MUÑOZ RIVERA, STE. 800 SAN JUAN, P.R. 00918-1813  
D. 787-282-5737 | T. 787-764-8181 | F. 787-753-8944 |  
[WWW.ONEILLBORGES.COM](http://WWW.ONEILLBORGES.COM)

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